

From: [John J. McNally](#)
To: [Durden, Brian](#); [Neeley, Michelle](#)
Cc: [Holmes, Michael P](#); [Maher, Jim](#); [Cosgrove, Pamela](#)
Subject: RE: Montco Research Products - Janice Drive, Hollister , FL - aerial photo/list of chemical product materials and location
Date: Wednesday, July 31, 2019 1:47:58 PM

Brian/all - I have been addressing with Mr. Sunoo and we have additional information to characterize and address the rainwater in the containment areas.

We also have further clarification about the identification of the other chemical products and waste as well. we have also been in contact with chemical/waste disposal companies and coordinating site work and plan/schedule to address in accordance with our conversations. Please let me know any questions and we can discuss the status and schedule of this work.

Thank you and we will accomplish this work.

John

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"Practical legal/technical environmental solutions"

-----Original Message-----

From: Durden, Brian [<mailto:Brian.Durden@FloridaDEP.gov>]
Sent: Tuesday, July 30, 2019 2:33 PM
To: John J. McNally; Neeley, Michelle
Cc: Holmes, Michael P; Maher, Jim; Cosgrove, Pamela
Subject: RE: Montco Research Products - Janice Drive, Hollister , FL - aerial photo/list of chemical product materials and location

Do you have any information regarding your clients determination of the liquid contained in the secondary containment?

Do you have a schedule/plan for waste identification and removal from the property or an estimated time to complete the plan?

-----Original Message-----

From: John J. McNally <john@mcnallylawpa.com>
Sent: Tuesday, July 30, 2019 12:43 PM
To: Durden, Brian <Brian.Durden@FloridaDEP.gov>; Neeley, Michelle <Michelle.Neeley@dep.state.fl.us>
Cc: Holmes, Michael P <Michael.P.Holmes@FloridaDEP.gov>
Subject: RE: Montco Research Products - Janice Drive, Hollister , FL - aerial photo/list of chemical product materials and location

Brian/all - I have been in contact with Mr. Sunoo concerning efforts at the

site to further confirm the materials and inspect and test the rain water and address the situation in accordance with our conversations. He has been to the site along with another former worker at the facility in order to address the action items listed below as we have discussed.

I have also been in contact with both waste disposal companies and entities involved in the brokering of chemical products for reuse. I am presently addressing both of these actions to address the materials at the facility.

Please let me know any questions and I will provide you with an update concerning the status of these efforts to address this site.

Thank you.

John.

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-----Original Message-----

From: John J. McNally [<mailto:john@mcnallylawpa.com>]

Sent: Wednesday, July 17, 2019 4:32 PM

To: 'Durden, Brian'; 'Neeley, Michelle'

Cc: 'Holmes, Michael P'

Subject: RE: Montco Research Products - Janice Drive, Hollister , FL - aerial photo/list of chemical product materials and location

Brian/all - as you are aware, I have provided FDEP with information describing the history of past facility operations and environmental remediation, as well as efforts to address the facility reconstruction since the fire incident last year. I had forwarded the message to you concerning the site information and summary as we have discussed and addressed in conjunction with the site meeting with the FDEP a couple of weeks ago with Han Sunoo. As we have discussed, we fully appreciate that it is very important to further inspect the conditions and identify the chemical products and materials that exist at the facility so we can clarify and make arrangements to address the facility and arrange for the disposition of the products and materials. I have also made efforts to identify the company that had been taking the waste from the facility so we can be prepared to have any material removed as soon as possible.

I have followed up with Han Sunoo concerning the subjects we have discussed and the actions that need to be taken and he has visited the site several times with former employees to enable this work. I have summarized some of the most significant action items and work tasks that I think are critical to address the site immediately in accordance with the FDEP requirements and avoid unnecessary regulatory enforcement and costs. In particular, based on

our conversation following the call with you and other the FDEP representatives after the site meeting, efforts are in progress to address each of the items in order of priority to address this work with the FDEP. The actions are described below:

- Clarify the contents of the drums in the various areas at the site
----this was performed by a consulting firm to create and inventory and location plan.
- Evaluate the water contained within the berm in the caustic soda location. In accordance with our conversations, pH testing of the water has been performed to determine acceptability for discharge.
- Evaluate the drums that are expanded to determine the contents and requirements for proper disposal -- inspection has been performed during site visit with former employee to clarify.
- Test the pH of the water contained within the containment berms at the facility and the contents in the containers within the berm for characterization - this has been further clarified during recent site visits with former employee.
- Consider options for return/transfer of the drums of chemicals present at the site for proper disposition - efforts have been made to contact companies for acceptance of chemicals or disposal.
- Contact disposal company that has performed work at the facility and is familiar with the materials and wastes at the facility --efforts have been made and are in progress.
- Prepare action plan for transmittal to FDEP within the next week to list each of these actions and the status and schedule of work.

Please contact me so we can further discuss and coordinate each of these actions at the site.

I will call or please call me to discuss the status.

Thanks.

John.

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-----Original Message-----

From: John J. McNally [<mailto:john@mcnallylawpa.com>]

Sent: Monday, July 15, 2019 3:47 PM

To: 'Durden, Brian'; 'Neeley, Michelle'

Cc: 'Han Sunoco'; 'Holmes, Michael P'

Subject: RE: Montco Research Products - Janice Drive, Hollister , FL - aerial photo/list of chemical product materials and location

Brian/all - I had intended to contacting you after we spoke following your site visit. I made notes of what you had discussed and I have remained in communication Han Sunoo concerning the status of the site and the FDEP comments and requirements in order to address the situation in a reasonable and practical manner in satisfying the requirements.. I have prepared a

summary of these actions for Montco and Han has been to the facility to further evaluate and clarify the liquids and containers and disposal as we had discussed. I can provide you with a list of the actions and schedule this week as we had discussed to demonstrate the planned work and schedule since last week.

I am contacting Han concerning the status of his efforts and will contact you to inform you of the work status and schedule for additional implementation.

Please let me know and we can discuss further and coordinate performance of this work with FDEP.

Thank you.

John.

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-----Original Message-----

From: Durden, Brian [<mailto:Brian.Durden@FloridaDEP.gov>]

Sent: Wednesday, July 03, 2019 11:43 AM

To: John J. McNally; Neeley, Michelle

Cc: Han Sunoco; Holmes, Michael P

Subject: RE: Montco Research Products - Janice Drive, Hollister , FL - aerial photo/list of chemical product materials and location

Thank you for the email including detailed site map and approximate materials located on site. Based on the observations made during the July 2, 2019, site visit to following recommendations are offered. See attached word document.

I look forward to chatting with regards to my comments if you have any questions.

Brian Durden

Florida Department of Environmental Protection Northeast District/Permitting
Program Environmental Manager

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48.37756612&sg_navigate=start

-----Original Message-----

From: John J. McNally <john@mcnallylawpa.com>

Sent: Monday, July 1, 2019 8:20 PM

To: Durden, Brian <Brian.Durden@FloridaDEP.gov>; Neeley, Michelle <Michelle.Neeley@dep.state.fl.us>

Cc: Han Sunoco <hsunoo@comcast.net>

Subject: FW: Montco Research Products - Janice Drive, Hollister , FL - aerial photo/list of chemical product materials and location

Brian/Michelle/HanI am providing this information so you are connected with my client, Han Sunoo, and connected by phone to coordinate the site visit tomorrow morning at 10am. His phone number is 386-372-5009 and I have included Han in this email so we are all connected....Brian can you provide a cell phone for us to reach you.

Han...I know we have confirmed the site meeting for tomorrow morning and please confirm that 10 am is good for you.

Attached is an aerial photo/figure with site areas, and list of chemical materials.

We can review and discuss and further clarify the site information as discussed for purposes of disposition of products and disposal of waste solution.

We are also contacting the disposal company that has routinely taken the caustic solution in the past so we can address as soon as possible.

Please let me know any questions...and please coordinate/confirm site meeting time.....and we can discuss tomorrow even when you are at the site. Thank you again and look forward to addressing the site together.

Thanks.

John.

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